

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

CORRECTED FIRST PAGE OF OBJECTION OF
UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-17-18)

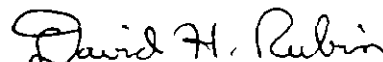
The United States Postal Service filed an objection to Douglas F. Carlson's interrogatories DFC/USPS-T39-17-18 yesterday, September 29, 1997, with the incorrect heading, using the heading for Docket No. MC96-3 instead of the heading for Docket No. R97-1. Despite some melancholy that the relatively peaceful days of Docket No. MC96-3 are past, the Postal Service intended yesterday's objections to be part of the Docket No. R97-1 proceeding. A corrected first page of the objections, with the only change being the use of the correct heading, is attached.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking


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September 30, 1997

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OBJECTION OF UNITED STATES POSTAL SERVICE
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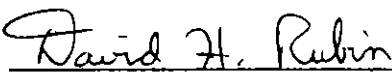
The Postal Service hereby objects to interrogatories DFC/USPS-T39-17-18 to witness Needham, filed by Douglas F. Carlson on September 18, 1997.

Interrogatory DFC/USPS-T39-17 asks witness Needham to confirm that the per-unit manufacturing costs of a single-color stamped card would be less than the cost of a multi-color stamped card. If witness Needham does not confirm, she is to provide all evidence available to support her answer, and provide cost data for the most recent year in which the Postal Service manufactured both a single-color stamped card and a multi-color stamped card. Interrogatory DFC/USPS-T39-18 asks witness Needham to "explain all reasons why the Postal Service stopped printing stamped cards in single-color designs", including an explanation of "the role of a former postmaster general in instigating or encouraging this change."

These interrogatories are objectionable on grounds of relevance. The information sought to be elicited is plainly not material to the issues before the Commission, and is beyond the scope of this proceeding. Procedures and policies related to designs for postal stationery are well within the Postal Service's and the Citizen's Stamp Advisory Committee's discretion. See 39 U.S.C. § 401(a)(4); see also POM § 212.1 (establishing procedures for selection of designs for postal stationery). The Postal Service does not offer single-color postal cards, so their costs

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



David H. Rubin

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